

Rachel Seaton Brownell (N.J. Bar No. 021842011)
Jillian L. Szymonifka (N.J. Bar No. 114492014)
LITTLER MENDELSON, P.C.
One Newark Center, Eighth Floor
Newark, New Jersey 07102
973.848.4700
Attorneys for Defendant

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

BETSY FRESSE,

Plaintiff,

vs.

STARBUCKS CORPORATION d/b/a,
STARBUCKS COFFEE COMPANY

Defendant.

Civil Action No. 2:20-cv-16567-MCA-LDW

**NOTICE OF DEFENDANT'S MOTION TO
COMPEL ARBITRATION AND DISMISS
OR STAY THE ACTION**

Electronically Filed

**To: Demetrios K. Stratis, Esq.
Ruta, Soulios & Stratis, Esq.
10-04 River Rd.
Fair Lawn, New Jersey 07410**

PLEASE TAKE NOTICE that, on **April 5, 2021 at 9:00 a.m.** or as soon thereafter as counsel may be heard, Defendant Starbucks Corporation d/b/a Starbucks Coffee Company ("Defendant"), by and through its attorneys, Littler Mendelson, P.C. (Rachel Seaton Brownell, Esq. appearing), will move this Court, before the Honorable Madeline Cox Arleo, U.S.D.J., at the United States District Court for the District of New Jersey, Frank R. Lautenberg U.S. Post Office and Courthouse, Courtroom MLK 4A, Federal Square, Newark, New Jersey, for an Order, pursuant to the Federal Arbitration Act, 9 U.S.C. § 1 *et seq.* and Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), granting Defendant's Motion To Compel Arbitration And Dismiss Or Stay The Action.

PLEASE TAKE FURTHER NOTICE that in support of the within motion, the undersigned attorneys for Defendant shall rely on the supporting memorandum of law and the

Declarations of Rachel Seaton Brownell, Esq. and Matthew Kennedy, and the exhibits appended thereto.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

LITTLER MENDELSON, P.C.
Attorneys for Defendant

By: /s/ Rachel Seaton Brownell
Rachel Seaton Brownell

Dated: March 10, 2021